

REMARKS

Applicants note with appreciation that the Office Action indicates that 24, 25, 49, 50, and 66 would be allowable if rewritten in independent form. Accordingly, new claim 67 is claim 24 rewritten in independent form, new claim 68 is claim 25 rewritten to be dependent on claim 67, new claim 69 is claim 49 rewritten in independent form, new claim 70 is claim 50 rewritten to be dependent on new claim 69, and new claim 71 is claim 66 rewritten in independent form. Allowance of new claims 67-71 is respectfully requested.

Claims 1-23, 26-48 and 51-65 are rejected under 35 U.S.C. 102(e) as being anticipated by Hall, *et al.* (United States Patent Number 5,786,865). Reconsideration of the rejections is respectfully requested.

Independent claims 1 and 26 are amended herein to clarify that a “video data compression unit” comprises a “local memory for storing the transformed video data and for storing” “differential video data generated by, and received from,” a “motion estimation processor.”

Independent claim 51 is amended herein to clarify a “method for compressing video data” comprises “storing the transformed video data,” and “storing the differential video data generated by, and received from, the motion estimation processor,” in “local memory.”

These features as claimed in claims 1, 26, and 51 are illustrated by way of example at least at Fig. 4 of the specification as filed. As shown in Fig. 4, a “local memory” comprises a first local memory LM0 122 that stores a differential macro block data 125, and a second local memory 130 that stores a resulting quantized and transformed data 127 (see Fig. 4 and page 14, line 28 through page 15, line 1 and page 15, lines 17-18 of the specification as filed). In this manner, the frequency of data bus access by the video data compression unit/ process is greatly reduced, as compared to conventional units/ processes, and, as a result, so is the amount of power consumed (see Tables 1 and 2, and page 7, lines 5-13, 16-20, page 15, lines 1-3, 18, 20, and page 16, lines 16-32 of the specification as filed).

It is submitted that Hall fails to teach or suggest a “video data compression unit” comprises a “local memory for storing the transformed video data and for storing” “differential video data generated by, and received from,” a “motion estimation processor,” as claimed in amended independent claims 1 and 26, and fails to teach or suggest a “method for compressing video data” comprises “storing the transformed video data,” and “storing the differential video data generated by, and received from, the motion estimation processor,” in “local memory,” as claimed in amended independent claim 51.

Instead, Hall teaches a motion estimation unit 43 that outputs motion vectors to a motion compensation unit 43 (see Hall, Figure 1 and column 5, lines 35-40). The motion estimation unit further provides an output that is negatively summed with an output of the motion compensation unit 43, and transferred to the input of a discrete cosine transformer 21 (see Hall, Figure 1 and column 5, lines 40-43). However, nowhere does Hall teach or suggest a “local memory” for storing a “differential video data generated by, and received from,” the motion estimation unit 43 or the motion compensation unit 41.

The Office Action at page 2, last line refers to the frame memory 42 of Hall as being a “local memory.” However, there is no teaching or suggestion in Hall that the frame memory 42 of Hall stores “differential video data generated by, and received from,” a “motion estimation processor,” as claimed in amended independent claims 1, 26, and 51. Instead, the frame memory 42 of Hall receives reconstructed current macroblock data, which is a sum of a lossy version of a difference macroblock, which is output from an inverse discrete cosine transform 31, and the output of the motion compensation unit 41 (see Hall, Figure 1 and column 5, lines 48-55). In fact, the frame memory 42 of Hall is similar to a conventional frame memory, for example, frame memory 24 illustrated at Fig. 1 and described in the Background section of the specification as filed, which receives the sum 22 of an output from an inverse discrete cosine transform IDCT 20 and a motion compensation block 26.

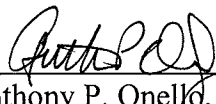
In view of the above, it is submitted that Hall fails to teach or suggest the invention set forth in amended independent claims 1, 26, and 51. Reconsideration of the rejections and

allowance of independent claims 1-23, 26-28, and 51-65 over Hall are therefore respectfully requested.

In view of the amendments to the claims and the foregoing remarks, it is believed that all claims pending in the application are in condition for allowance, and such allowance is respectfully solicited. If a telephone conference will expedite prosecution of the application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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